

REMARKS

Claims 1-55 remain pending in the application.

Claims 1-13, 23-29 and 36-55 over Kung

In the Office Action, claims 1-13, 23 and 36-55 were rejected under 35 U.S.C. §102(e) as allegedly being anticipated by U.S. Patent No. 6,826,173 to Kung ("Kung"). The Applicants respectfully traverse the rejection.

Claims 1-13, 23 and 36-55 recite a system and method of retrieving a station ID of a client device from any of customer information, customer ID and device ID previously stored within a message router.

The Examiner alleges that Kung discloses retrieving a station ID of a client device based on customer information at col. 7, lines 62-67 where the preference data allegedly equates to the user specified information on where the user wants the call to do, and the terminal configuration data allegedly is information about the devices connected to the broadband residential gateway and specify which device can receive which type of call (See Office Action, page 3). The Applicants respectfully disagree.

Kung at col. 7, lines 62-67 discloses a user specifying alert options, calling party preference data and terminal configuration data, and hence the priority of communications in real time in response to user input. Thus, Kung at col. 7, lines 62-67 has nothing to do with a retrieving of a station ID from any of customer information, customer ID and device ID, much less retrieving a station ID of a client device from any of customer information, customer ID and device ID previously stored within a message router, as recited by claims 1-13, 23 and 36-55.

Kung routes alerts within the system based on convention packet switching (See col. 4, lines 48-53). Conventional packet switching relies a station ID being attached to an alert, the alert being routed to the station with a router by simply retrieving the station ID from the alert packet. Thus, convention packet switching relies on a station ID being attached to an alert NOT retrieving a station ID of a client device from any of customer information, customer ID and device ID

previously stored within a message router, as recited by claims 1-13, 23 and 36-55.

A benefit of retrieving a station ID of a client device from any of customer information, customer ID and device ID previously stored within a message router is, e.g., providing an alert to more stations. In many instances, an alert service may want to send an alert to stations without knowing all of the station IDs of stations and their associated station IDs attached to a network. Conventionally, alerts are only able to be sent to stations with station ID known **in advance**. However, an alert source may want to target additional stations. By retrieving a station ID of a client device from any of customer information, customer ID and device ID previously stored within a message router, an alert can be sent to stations **without knowing in advance** station IDs. The cited prior art fails to disclose or suggest the claimed features having such benefits.

Accordingly, for at least all the above reasons, claims 1-13, 23 and 36-55 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claims 7, 8, 25, 26, 43, 44, 54 and 55 over Kung in view of Boyle

In the Office Action, claims 7, 8, 25, 26, 43, 44, 54 and 55 were rejected under 35 U.S.C. §102(e) as allegedly being obvious over Kung in view of U.S. Patent No. 6,138,158 to Boyle et al. ("Boyle"). The Applicants respectfully traverse the rejection.

Claims 7, 8, 25, 26, 43, 44, 54 and 55 recite a system and method of retrieving a station ID of a client device from any of customer information, customer ID and device ID previously stored within a message router.

The Office Action acknowledges that Kung fails to disclose segmenting an alert with a selected protocol gateway into message segments before sending the alert over a network and having the client reconstruct the message segments (See Office Action, page 11). The Office Action relies on Boyle at col. 13, lines 37-48 to allegedly make up for the deficiencies in Kung to arrive at the claimed features. The Applicants respectfully disagree.

Boyle discloses at col. 13, lines 37-48 segmenting a PUSH PDU into a sequence of fragments, each being treated as a short message with a length no more than the maximum length allowed in a SMSC. However, Boyle, like Kung, discloses conventional packet switching (See col. 5, line 59-col. 6, line 29). Boyle fails to disclose or suggest retrieving of a station ID from any of customer information, customer ID and device ID stored in a message router, much less retrieving a station ID of a client device from any of customer information, customer ID and device ID previously stored within a message router, as recited by claims 7, 8, 25, 26, 43, 44, 54 and 55.

Thus, even if it were obvious to modify Kung with the disclosure of Boyle (which it is not), the theoretical result still fails to disclose or suggest retrieving a station ID of a client device from any of customer information, customer ID and device ID previously stored within a message router, as recited by claims 7, 8, 25, 26, 43, 44, 54 and 55.

Accordingly, for at least all the above reasons, claims 7, 8, 25, 26, 43, 44, 54 and 55 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claims 10, 11, 27, 28, 46 and 47 over Kung in view of Ramasubramani

In the Office Action, claims 10, 11, 27, 28, 46 and 47 were rejected under 35 U.S.C. §102(e) as allegedly being obvious over Kung in view of U.S. Patent No. 6,507,589 to Ramasubramani et al. ("Ramasubramani"). The Applicants respectfully traverse the rejection.

Claims 10, 11, 27, 28, 46 and 47 recite a system and method of retrieving a station ID of a client device from any of customer information, customer ID and device ID previously stored within a message router.

The Office Action acknowledges that Kung fails to disclose returning an acknowledgement from a client to a protocol gateway and then forwarded to a server (See Office Action, page 11). The Office Action relies on Ramasubramani at col. 8, lines 20-35 to allegedly make up for the deficiencies in Kung to arrive at the claimed features. The Applicants respectfully disagree.

Ramasubramani at col. 8, lines 20-35 discloses an Internet receive process and a deliver process, the deliver process waiting for an acknowledgement that a notification was received and may also retry the sending as needed. However, Ramasubramani, like Kung and Boyle, discloses conventional packet switching (See col. 7, lines 45-66). Ramasubramani fails to disclose or suggest retrieving of a station ID from any of customer information, customer ID and device ID stored in a message router, much less retrieving a station ID of a client device from any of customer information, customer ID and device ID previously stored within a message router, as recited by claims 10, 11, 27, 28, 46 and 47.

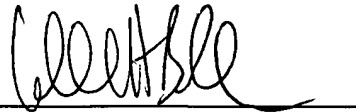
Thus, even if it were obvious to modify Kung with the disclosure of Ramasubramani (which it is not), the theoretical result still fails to disclose or suggest retrieving a station ID of a client device from any of customer information, customer ID and device ID previously stored within a message router, as recited by claims 10, 11, 27, 28, 46 and 47.

Accordingly, for at least all the above reasons, claims 10, 11, 27, 28, 46 and 47 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Conclusion

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'William H. Bollman', written over a horizontal line.

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